

Avatar Environmental LLC
107 S. Church Street
West Chester Pennsylvania, 19382

Dear Sirs:

Enclosed are the Arizona Game and Fish Department's (Department) comments on the final *Notice of comment Inquiry Review Avian/Communication Towers Collisions* that was prepared for the Federal Communications Commission (FCC). The Department appreciates the effort that went into the preparation of the document and the identification of reviewers' main points:

1. Towers greater than 400 feet tall caused more mortalities than those under;
2. Guy wires, which are used for towers over 600 feet, are related to avian deaths;
3. White lights on top of the towers, caused less confusion in night migrating birds than red;
4. Blinking lights cause fewer mortalities than steady lights;
5. Towers with no lights caused the least mortalities;
6. Towers in flyways caused more mortalities than those not associated with flyways.

The Department acknowledges the fact that there are conflicting estimates of bird mortality associated with collisions. However, we believe the report should spend more time focusing on the fact that thousands, if not millions, of birds die each year due to collisions with towers rather than debating the validity of individual estimates of collision induced mortality. Due to the conflicting evidence that is available, we recommend, the FCC take an avian conservation perspective, and apply the upper-most mortality estimates, as determined by carcass recovery, as a conservative estimate of actual avian mortality.

In addition, we recommend that the FCC use the guidelines for locating and constructing communication towers published by the U. S. Fish and Wildlife Service (Service) in 2000 when planning for new towers or retrofitting towers that are currently in place and known to be a source of avian mortality.

If you have any questions regarding this letter, please contact William E. Van Pelt, Nongame Birds Program Manager, (602) 789-3573, bvanpelt@azgfd.gov.

Sincerely,

Duane L. Shroufe
Director

DLS:bvp

Cc: Leonard Ordway, Acting Chief, Nongame and endangered Wildlife Program
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